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25 **UNITED STATES BANKRUPTCY COURT
26 NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION**

28 **In re:**

29 **PG&E CORPORATION,**

30 **- and -**

31 **PACIFIC GAS AND ELECTRIC
32 COMPANY,**

33 **Debtors.**

- 34 Affects PG&E Corporation
35 Affects Pacific Gas and Electric
36 Company
37 Affects both Debtors

38 ** All papers shall be filed in the Lead
39 Case, No. 19-30088 (DM).*

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54 Case Nos. 19-30088 (DM)

55 (Lead Case) (Jointly Administered)

56 **DECLARATION OF RICHARD W. SLACK
57 IN SUPPORT OF REORGANIZED
58 DEBTORS' BRIEF REGARDING
59 DISCOVERY STAY**

I, Richard W. Slack, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a member of Weil, Gotshal & Manges LLP, counsel for Pacific Gas and Electric Company and PG&E Corporation (collectively, the “**Debtors**” or “**Reorganized Debtors**”). I respectfully submit this declaration in support of *Reorganized Debtors’ Brief Regarding Discovery Stay*.

2. Attached as **Exhibit A** is a true and correct copy of a June 26, 2023 email I sent to Susan DiCicco copying counsel for the RKS Claimants, Baupost, and others, with the subject line “RE: PG&E -- Proposed Order with Objectors’ comments.”

3. Attached as **Exhibit B** is a true and correct copy of a July 9, 2023 email and attachments I sent to Susan DiCicco and others copying counsel for PERA, the RKS Claimants, Baupost, and others, with the subject line “Draft Procedures re Securities Claims.”

4. Attached as **Exhibit C** is a true and correct copy of a July 19, 2023 email Michael Palmieri, counsel for Baupost, sent to me and others, with the subject line “RE: PG&E -- Draft Procedures re Securities Claims.”

5. Attached as **Exhibit D** is a true and correct copy of a December 15, 2023 email and attachments Michael Palmieri, counsel for Baupost, sent to me and others, with the subject line “In re PG&E Corp. . . Requests for Production and Deposition Subpoenas.” Baupost served requests for production to Reorganized Debtors and deposition subpoenas for four non-parties.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed January 16, 2024 in New York.

/s/ Richard W. Slack
Richard W. Slack